

Torres, Francine

From: cjarrard@chisweet.com%inter2 [cjarrard@chisweet.com] on behalf of cjarrard@chisweet.com
Sent: Wednesday, August 10, 2005 6:22 PM
To: National List
Cc: Michael_DeLuca@floridacrystals.com%inter2; rfriedman@chisweet.com%inter2; pmcswain@chisweet.com%inter2; snewton@chisweet.com%inter2
Subject: Re:National Organic Program, Sunset Review, Docket # TM-04-07
Attachments: ATTACHMENT.TXT

Dear Mr. Neal,

In response to your request for comments for the National Organic Program Sunset Review, please accept Chicago Sweeteners request that Calcium Hydroxide continue to be allowed for use in organic handling and remain intact on the National List as originally approved (Section 205.605).

We request this continuation for the following reasons:

1. Calcium Hydroxide (CaH_2O_2) has been determined by the National Organic Standards Board (NOSB) to be consistent with the Organic foods Production Act (OFPA), its implementing regulations and criteria for substances allowed in organic production and handling.
2. Calcium Hydroxide is necessary in the purification of the freshly squeezed cane juice that is concentrated and crystallized to produce the organic sugar that is common in our diet and essential to multiple products our customers produce daily.
3. As a Food Science graduate I fully understand that there are no viable alternatives to Calcium Hydroxide in the production of organic sugar. Therefore, to disallow this "natural" (simply made by hydrating lime with water) ingredient is to cut the supply of Organic Sugar to crisis levels, leaving thousands of food manufacturers without a viable and necessary component, to produce thousands of established products.
4. The amount of Calcium Hydroxide utilized within the production of Organic Sugar is so small, yet necessary, that any conceivable risk is unfathomable.
5. Calcium Hydroxide is utilized in water treatment and as an egg preservative.

CSI is aware of no reason why Calcium Hydroxide should not be allowed for use in Organic handling and we confidently support its continued approval.

Sincerely,

W. Craig Jarrard
Senior Product Manager
Chicago Sweeteners, Inc.

8/11/2005